From: Betsy Appleton
To: Contact OGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Thursday, June 16, 2022 9:14:20 PM

I oppose OGE's proposed legal expense fund regulation as drafted. OGE should:
1. Remove the exception that makes compliance with the regulation optional; It isn't a regulation if it is optional--this is absurd.
2. Replace the proposed recusal requirement with a broader 5-year recusal requirement that prevents donors of cash gifts from influencing decisions, policies, or regulations affecting them or the industries in which they have substantial interests;
3. Remove the offensive example involving an accused sexual harasser (COME ON.); and
4. Place nonprofit charities (501(c)(3) organizations) on an equal footing with large law firms by allowing them to hire legal counsel for whistleblowers.

Sincerely,
Betsy Appleton

Please note that I am observing daily screen-free time after 8:30pm. If you need to reach me in the evening, please call me instead.